

1 IN THE UNITED STATES DISTRICT COURT
2 FOR THE WESTERN DISTRICT OF OKLAHOMA
3 (1) ROBERT BALES and)
4 (2) DANIELLE BALES,)
5 Plaintiffs,)
6 -vs-) No. 22-CV-00851
7 (1) STATE FARM FIRE and)
8 CASUALTY COMPANY,)
9 Defendant.)

10
11 DEPOSITION OF JAMES RYAN PHILLIPS

12 TAKEN ON BEHALF OF THE PLAINTIFFS
13

14 IN TULSA, OKLAHOMA

15 ON JULY 14, 2023
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25 REPORTED BY: KASEY D. EGELSTON, CSR

<p style="text-align: right;">Page 14</p> <p>1 Q What did you do for State Farm right out of 2 college? 3 A I was a claims adjuster. 4 Q What kind of claims were you adjusting at 5 that time? 6 A Initially, I was handling casualty claims, 7 along with first-party commercial claims. 8 Q And that -- you would have started that job 9 with State Farm in about 2008 or, I guess, 2006? 10 A I'm trying to think. Yes. Approximately 11 2006. May of 2006. 12 Q And how did you come to start working for 13 State Farm? 14 A They were present at a job fair at Oklahoma 15 State University in Tulsa and actually provided the 16 best salary out of the other options I had. 17 Q Okay. After you -- since you started 18 working for State Farm in about 2006, or so, have 19 you worked for any other companies? 20 A I have not. 21 Q You've been with State Farm the entire time 22 since after you graduated from college? 23 A Yes, sir. 24 Q Have you been a claims adjuster that entire 25 time?</p>	<p style="text-align: right;">Page 16</p> <p>1 Q Okay. And what did you do for them? 2 A General laborer. 3 Q Okay. What kind of construction did those 4 two companies do? 5 A I believe Norris Construction was a general 6 contractor. 7 Q Okay. 8 A And Burggraf is a mitigation company, water 9 mitigation from fire. 10 Q Did you ever work on a roof? 11 A I did not. 12 Q Put on a roof? 13 A I never have, no. 14 Q Installed a roof? 15 A I have not. 16 Q Repair a roof? 17 A I have not. 18 Q About how long did you work for -- about 19 how long did you work in construction, like a labor 20 hand. Is it fair to say -- 21 A Yes. 22 Q -- you were a labor hand for these 23 construction companies? 24 A Yes. 25 Q About how long did you do that?</p>
<p style="text-align: right;">Page 15</p> <p>1 A Yes, sir. 2 Q Ever held any kind of managerial position 3 or anything like that? 4 A I have not. 5 Q Have you -- excuse me. Have you adjusted 6 casualty claims or first-party commercial claims the 7 entire time you've worked for State Farm? 8 A I have not. 9 Q What other types of claims have you 10 adjusted? 11 A I do not currently handle casualty claims, 12 so I just handled the casualty for approximately 13 four or five years at that time, but the remaining 14 time I've handled first-party claims. 15 Q Ever adjust motor vehicle claims? 16 A Never worked on autos. 17 Q Personal injuries, anything like that, 18 liability claims? 19 A On the auto side, I have not. 20 Q Do you have any construction experience? 21 Ever work in construction? 22 A I did in high school. 23 Q Okay. 24 A For Burggraf Restoration and also for 25 Norris Construction.</p>	<p style="text-align: right;">Page 17</p> <p>1 A About two or three summers. 2 Q Okay. So you worked in the summers in high 3 school? 4 A Yes. 5 Q Go back to school and work the next summer? 6 A Yes. 7 Q About three summers or so? 8 A That's correct. 9 Q When did you first get your adjuster's 10 license? 11 A When I was first hired by State Farm. 12 Q So 2006, approximately? 13 A Yes, sir. 14 Q Do you hold an active adjuster's license in 15 Oklahoma? 16 A I do. 17 Q Do you hold an active adjuster's license in 18 any other states? 19 A Yes, I do. 20 Q Which other states? 21 A I believe Florida, North Carolina, South 22 Carolina and I want to say Louisiana. 23 Q Have you adjusted claims for State Farm in 24 Florida, North Carolina, South Carolina and 25 Louisiana?</p>

1 Q What about speeds of wind? 2 A Yes. 3 Q Like what speed of wind it might take to cause damage to a composition shingled roof? 4 A Yes. 5 Q Did you also receive training on how to identify damage on roofs not caused by a storm? 6 A Yes. 7 Q Okay. So training on how to identify blisters? 8 A Correct. 9 Q What's a blister on a shingle? On a composition shingle? 10 A A blister is typically caused by excess heat in the attic and the blister typically will expand and pop from the bottom outward and there should be a pit where there's fibers showing in the center of that blister. 11 Q There could be -- you described blisters as popping open. There could be popped open blisters and closed blisters. Fair? 12 A Yes. 13 Q Not every blister you see is going to be popped out yet. Is that true? 14 A In my experience, yes, that is correct.	Page 34	1 A Yes, sir. 2 Q In the context of wear and tear damage to a roof, what age of a roof would you expect to start seeing wear and tear damage? 3 MR. BROWN: Object to the form. Go ahead. 4 THE WITNESS: I don't believe there's an exact date that you can put on a roof for that. 5 Q (By Mr. Lawson) What about blisters, how long might it take for blisters to start showing on a roof? 6 MR. BROWN: Object to the form. Go ahead. 7 THE WITNESS: It's the same thing. You can't put an exact date or time, but you'll start seeing them versus not. 8 Q (By Mr. Lawson) I also mentioned granular loss. Granular loss can be indicative of wear and tear damage. True? 9 A Yes. 10 Q Granular loss can also occur as a result of hail. True? 11 A Yes. 12 Q If hail hits the shingles, it might knock some of the granules off. True?	Page 36
1 Q Have you ever been out -- have you ever been on an inspection of a composition shingled roof and seen closed blisters -- 2 A Yes. 3 Q -- on shingles? What -- other types of non-storm related damage might be wear and tear. Fair? 4 A Can you repeat that question? 5 Q It was a bad question. In your training for identifying damage to roofs, other than storm-related damages, we talked about blisters, you might also have received training on wear and tear damage. True? 6 A Yes. 7 Q Wear and tear can be granular loss? 8 A Yes. 9 Q Mechanical damage? 10 A Yes. 11 Q You might encounter shingle defects. True? 12 A Yes. 13 Q And you're trained on how to identify all of these types of damage? 14 A I am. 15 Q How to distinguish that type of damage versus hail or wind?	Page 35	1 A Yes. 2 Q In that situation, that would be covered by a policy. True? 3 MR. BROWN: Object to the form. 4 Q (By Mr. Lawson) If a State Farm policy provides coverage to hail damage to a roof, hail damage that has caused granular loss would be covered under that policy. Fair? 5 MR. BROWN: Object to the form. 6 THE WITNESS: Granular loss in and of itself does not mean that the shingle has been damaged. 7 Q (By Mr. Lawson) If a shingle is hit by hail and granules fall off of a shingle, that would be covered under such a policy. Fair? 8 MR. BROWN: Object to the form. 9 THE WITNESS: Again, granular loss is -- granule loss does not mean -- constitute damage to a shingle. 10 Q (By Mr. Lawson) Okay. Does State Farm provide you with physical training materials? 11 A I do not have any physical training materials currently. 12 Q Does State Farm provide you with digital training materials?	Page 37

<p>1 Q Okay. What happens after you get off the 2 roof after your second inspection? 3 A I believe I did -- we did speak to -- I did 4 speak to Meleah. We kind of spoke, kind of what we 5 summarized and found. Saying we documented what you 6 have circled. I don't believe that's hail damage. 7 I do believe she's mentioned, well, I know you guys 8 have to have matting breakage for that to be damage, 9 but she was saying I believe that granular loss is 10 actual damage. So we discuss that as well. 11 Unfortunately, just granules off of a shingle 12 doesn't constitute damage. And then I said, but we 13 will send this to management for further review and 14 if there's anything further we can do, we'll get 15 back to you.</p> <p>16 Q What do the granules on a shingle do? 17 A They provide you UV protection. They also 18 act as an assist for accompanying precipitation off 19 of a roof, whether it's rain, most recently around 20 here was sleet, everyone had granules in their 21 downspouts and their property after that sleet storm 22 we had. Granules are designed to come off the roof 23 to help escort those off of the roof surface. So 24 there's about 125% of the granules required on that 25 shingle, so when the manufacturer makes that, they</p> <p>1 put 125% of the granules required, so there's tons 2 of granules that come off anyway, but typically, 3 that's what they're designed for.</p> <p>4 Q You said that the granules help protect 5 against UV rays? 6 A Yes.</p> <p>7 Q When granules come off of the shingles, 8 does that make the shingle more susceptible to UV 9 rays? 10 MR. BROWN: Object to the form. 11 THE WITNESS: Yes. As with anything, 12 the wear and tear of that shingle lowers the life 13 expectancy and its ability to keep that roof and 14 that attic from getting too hot. So, as the 15 shingles lose granules over time due to wear and 16 tear, it can definitely cause that, yes.</p> <p>17 Q (By Mr. Lawson) Shingles can also lose 18 granules due to hail; correct? 19 A Yes. Shingles lost granules because of the 20 sleet. And sleet is BB-sized ice pellets. I would 21 say yes, hail could also do that too.</p> <p>22 Q So if sleet causes granular loss on 23 shingles, that would be a covered cause of loss; 24 correct? 25 MR. BROWN: Object to the form.</p>	<p>Page 158</p> <p>1 THE WITNESS: There is no functional 2 damage to the shingle from granular loss.</p> <p>3 Q (By Mr. Lawson) Is there a requirement in 4 this policy that damage has to be functional damage? 5 MR. BROWN: Object to the form.</p> <p>6 THE WITNESS: The policy covers direct 7 physical damage and structural damage. It is our 8 assertion that for hail, it has to break the matting 9 and compromise the water shedding ability of the 10 roof. So granules off the roof doesn't affect the 11 water shedding ability, it may affect the longevity 12 of the shingle, as with normal wear and tear, but 13 for us, hail damage is considered matting breakage.</p> <p>14 Q "Us" being State Farm? 15 A Yes, sir. And that's brought upon by the 16 studies of Haag Engineering. That's the standard 17 for insurance companies as well.</p> <p>18 Q And State Farm provides you with that Haag 19 training; correct? 20 A Yes, sir. We do that yearly.</p> <p>21 Q Do you know if there's any kind of cosmetic 22 exclusion in the Bales' policy? 23 MR. BROWN: Object to the form.</p> <p>24 THE WITNESS: I did not see a cosmetic 25 exclusion on the policy.</p>
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<p>1 A At their request, we can share a few of the 2 photos with them.</p> <p>3 Q If you're confident in your claims 4 adjusting, you should have no problem providing 5 those photos. Fair?</p> <p>6 MR. BROWN: Object to the form.</p> <p>7 THE WITNESS: Yes. The roof speaks for 8 itself, so any photos would just be an extension of 9 what the roof shows.</p> <p>10 Q (By Mr. Lawson) Do you know if any photos 11 were ever provided to Meleah or the Bales family?</p> <p>12 MR. BROWN: Object to the form.</p> <p>13 THE WITNESS: I can't recall. I don't 14 believe so.</p> <p>15 Q (By Mr. Lawson) Do you agree that a 16 homeowner shouldn't have to file a lawsuit to 17 provide documentation about their insurance claim?</p> <p>18 MR. BROWN: Object to the form.</p> <p>19 THE WITNESS: Documentation provided is 20 the information that is pertinent to the claim that 21 we provide to all customers, so I believe they 22 received all of the information that was required on 23 this claim.</p> <p>24 Q (By Mr. Lawson) I'm handing you what's 25 marked as Exhibit Number 15. This is a letter dated</p>	Page 194	<p>1 notations. Those notations were made by the roofer.</p> <p>2 Q Were you present during that inspection?</p> <p>3 A No. The roof inspectors are not to make a 4 10-plus or write the number of hits on a roof like 5 that. I would have to review, but I don't believe 6 that was even the same color of chalk that he was 7 using on the roof, I believe.</p> <p>8 Q Regardless, if -- well, Meleah expressed 9 concern that Korbin Leach had marked 10-plus hits 10 per square and that was different from what was 11 reflected in his report; correct?</p> <p>12 MR. BROWN: Object to the form.</p> <p>13 THE WITNESS: Well, at this point we 14 had already done a second inspection with her on the 15 roof, so it was all a moot point. Because when we 16 were on the roof with her, what she documented -- 17 what she believed was hail damage, was not hail 18 damage.</p> <p>19 Q (By Mr. Lawson) It's reasonable for her -- 20 for a public adjuster to be concerned about 21 differences between what a ladder assist says on the 22 roof versus what's reflected in his report. Fair?</p> <p>23 MR. BROWN: Object to the form.</p> <p>24 THE WITNESS: Yeah. She believed that 25 the inspector wrote the 10-plus on the roof, but</p>	Page 196
<p>1 March 21st of 2022, sent from Ms. Meadows; correct?</p> <p>2 (Plaintiffs' Exhibit Number 15 was 3 marked for identification purposes 4 and made a part of the record.)</p> <p>5 THE WITNESS: Yes.</p> <p>6 Q (By Mr. Lawson) Do you recall receiving 7 this letter?</p> <p>8 A Yes. I think the in-office adjuster 9 received it first and then I did review the letter 10 after she saw it.</p> <p>11 Q It looks like the photos were sent to Ms. 12 Meadows and she had an opportunity to respond to 13 them; correct?</p> <p>14 A I think she received a copy of the initial 15 inspection report, yes.</p> <p>16 Q She states in this letter, upon review of 17 Mr. Leach's photographs, you can see that he noted 18 10-plus hits in the test squares; correct?</p> <p>19 MR. BROWN: Object to the form.</p> <p>20 THE WITNESS: That's what she is 21 claiming. That's what she notes, right.</p> <p>22 Q (By Mr. Lawson) This raised a concern with 23 Ms. Meadows because the report contradicts this; 24 right? I'm sorry.</p> <p>25 A It wasn't the inspector who made those</p>	Page 195	<p>1 later said no damage, that would be concerning, but 2 it wasn't the inspector who wrote those.</p> <p>3 Q (By Mr. Lawson) That's something you would 4 want to confirm because you weren't at that initial 5 inspection; correct?</p> <p>6 A Yes, sir.</p> <p>7 Q Did you ever talk to Mr. Leach about 8 whether he marked -- made the 10-plus hits markings 9 on the roof?</p> <p>10 MR. BROWN: Object to the form. I know 11 we're asking a lot of questions about this. Let the 12 witness look at the report and maybe we can clarify.</p> <p>13 MR. LAWSON: Sure.</p> <p>14 THE WITNESS: Okay. So it appears that 15 Korbin's chalking would have been blue. I do see 16 right here that he writes 10-by-10 on the roof.</p> <p>17 Q (By Mr. Lawson) What page are you looking 18 at?</p> <p>19 A This is page 405. And then there is -- in 20 that picture, there's an F equals 10. I can't make 21 out the next symbol, but I would assume it says F 22 equals 10-plus in white chalk. And there's also 23 several circles in white chalk. So I would assume 24 the white is from the roofing inspector, who was 25 there present with Korbin.</p>	Page 197

<p style="text-align: right;">Page 198</p> <p>1 Q But that's an assumption on your part?</p> <p>2 A That is going to be -- that is my</p> <p>3 assertion. Also, page 409, there are blue circles</p> <p>4 where Korbin has circled areas for consideration.</p> <p>5 It's a typical activity by these inspectors when the</p> <p>6 roofer is present there with them, the roofer wants</p> <p>7 them to circle certain items for us to consider. So</p> <p>8 the blue chalk is guaranteed to be Korbin's and the</p> <p>9 white appears to be what the roofer had marked</p> <p>10 previously. It also appears that he used the blue</p> <p>11 chalk to draw out a test square at the corner edges</p> <p>12 of the square and it's consistent with our 10-by-10</p> <p>13 on page 415. And that is a consistent marking on</p> <p>14 the roof by these roofing inspectors.</p> <p>15 Q What about page 426, the top photo?</p> <p>16 A Yeah. I was going to point that out. And</p> <p>17 then also, you can see a better shot of that on --</p> <p>18 Q 434?</p> <p>19 A Yes. Yep. There is a better shot. So</p> <p>20 that looks like it says back equals 10-plus and</p> <p>21 that's in blue, so.</p> <p>22 Q And you asserted that the blue chalk was</p> <p>23 from Mr. Leach; correct?</p> <p>24 A Yes, sir. So he would have written that on</p> <p>25 the roof.</p>	<p style="text-align: right;">Page 200</p> <p>1 the second inspection with Mr. Fouda, expresses some</p> <p>2 concern about that second inspection; correct?</p> <p>3 A She has concerns about him being present, I</p> <p>4 guess, yes.</p> <p>5 Q What's she's saying is it's clear Mr.</p> <p>6 Fouda was there to discount anything that may have</p> <p>7 been considered as hail damage; correct?</p> <p>8 A That's what she is claiming, yes.</p> <p>9 Q We talked about that earlier. You don't</p> <p>10 want to be disagreeing with a fellow claims adjuster</p> <p>11 in front of the insured or representatives; right?</p> <p>12 A I do believe we said that we don't have --</p> <p>13 allow a verbal disagreement. We could have</p> <p>14 definitely a conversation with regard to what we're</p> <p>15 seeing on the roof, but his presence made no</p> <p>16 difference in regard to my accurate assessment of</p> <p>17 that roof.</p> <p>18 Q Also, in that second paragraph she says</p> <p>19 "State Farm is imposing a company guideline of</p> <p>20 saying there needs to be mat fracturing or bruising</p> <p>21 present to deny the hail damage."</p> <p>22 Did I read that correctly?</p> <p>23 A Yes.</p> <p>24 Q And we've talked about that. That's your</p> <p>25 understanding of what hail damage is; correct?</p>
<p style="text-align: right;">Page 199</p> <p>1 Q So if he's saying back equals 10-plus, but</p> <p>2 his report says no hail damage, that's inconsistent</p> <p>3 -- an inconsistency between his photos and the</p> <p>4 report. Fair?</p> <p>5 MR. BROWN: Object to the form.</p> <p>6 THE WITNESS: My understanding is that</p> <p>7 he's saying back equals 10-plus circles for</p> <p>8 consideration, as he is not able to make a coverage</p> <p>9 decision on there. So he's documenting the number</p> <p>10 of blemishes that he sees.</p> <p>11 Q (By Mr. Lawson) Did you ever call Mr.</p> <p>12 Leach to clarify that?</p> <p>13 A I did not. I didn't speak to him.</p> <p>14 Q You didn't investigate that?</p> <p>15 MR. BROWN: Object to the form.</p> <p>16 THE WITNESS: I did not speak to him</p> <p>17 about it.</p> <p>18 Q (By Mr. Lawson) Ms. Meadows brought the</p> <p>19 potential for a discrepancy to your attention.</p> <p>20 Fair?</p> <p>21 MR. BROWN: Object to the form --</p> <p>22 Q (By Mr. Lawson) In this March 21st letter?</p> <p>23 A It does, yeah.</p> <p>24 Q Looking again at that March 21st letter,</p> <p>25 the second paragraph brings up a concern that during</p>	<p style="text-align: right;">Page 201</p> <p>1 MR. BROWN: Object to the form.</p> <p>2 THE WITNESS: Yes. According to the</p> <p>3 experts in Haag Engineering and according to science</p> <p>4 and review that a fractured shingle would compromise</p> <p>5 the water shedding ability. Shingles without</p> <p>6 granules, there's really no structural damage to</p> <p>7 that shingle itself.</p> <p>8 Q (By Mr. Lawson) And that's how State Farm</p> <p>9 has trained you to evaluate hail damage; correct?</p> <p>10 MR. BROWN: Object to the form.</p> <p>11 THE WITNESS: That's how I would say</p> <p>12 all insurance companies evaluate hail damage.</p> <p>13 Q (By Mr. Lawson) Have you received training</p> <p>14 from any insurance company other than State Farm?</p> <p>15 A No. I know for sure that's how State Farm</p> <p>16 instructs us, but Haag is an industry standard and</p> <p>17 that's how they tell anyone adjusting roof claims</p> <p>18 that that's what hail damage would be. So if</p> <p>19 they're using Haag standards, that's what Haag is</p> <p>20 saying is there has to be matting breakage.</p> <p>21 Q Okay. Are you required -- does State Farm</p> <p>22 require you to respond to all correspondence from a</p> <p>23 policyholder or one of their representatives?</p> <p>24 A Yes.</p> <p>25 Q How long should it take you to respond?</p>

<p>1 THE WITNESS: No. We provide a fair 2 evaluation of their claim every time we do an 3 inspection of their loss.</p> <p>4 Q (By Mr. Lawson) Do you agree with me that 5 if this storm damaged the Bales' home during the 6 policy period, no matter what happened in the past, 7 it's covered?</p> <p>8 MR. BROWN: Object to the form.</p> <p>9 THE WITNESS: If the storm takes place 10 during the policy period, we'll definitely come out 11 and investigate the loss.</p> <p>12 Q (By Mr. Lawson) And if it's a covered 13 cause of loss, it should be paid regardless of 14 anything that might have happened in the past; 15 correct?</p> <p>16 MR. BROWN: Object to the form.</p> <p>17 THE WITNESS: If it's a covered cause 18 of loss and the inspection of the property reveals 19 damage consistent with that, then we would pay for 20 the roof.</p> <p>21 Q (By Mr. Lawson) The Bales should receive 22 insurance benefits for that loss. Fair?</p> <p>23 A Correct. If I find damage consistent with 24 that, with wind, damage consistent with hail, then 25 they'll be paid for that.</p>	<p>Page 206</p> <p>1 compliance with State Farm's requirements?</p> <p>2 A I do.</p> <p>3 Q Have you understood all of the questions that I have asked today?</p> <p>4 A I have.</p> <p>5 Q Or asked me to rephrase?</p> <p>6 A I have.</p> <p>7 Q Have I been polite and professional to you?</p> <p>8 A You have.</p> <p>9 MR. LAWSON: I don't have any further 10 questions. I'll pass the witness.</p> <p>11 MR. BROWN: I typically don't ask any 12 questions, so I don't want to keep you any longer, 13 but I do think we need some clarification.</p> <p>14 CROSS EXAMINATION</p> <p>15 BY MR. BROWN:</p> <p>16 Q If you'll go to Exhibit 4, Ladder Now. And there was a lot of talk about the color of chalk used. I mean, you weren't at the inspection. Fair enough?</p> <p>17 A Fair enough. Yes.</p> <p>18 Q You don't know who had color chalk or who didn't have color chalk or whatnot, but there are some markings on the roof. True?</p> <p>19 A Yes.</p>
<p>1 Q Do you agree older roofs are more 2 susceptible to wind and hail damage?</p> <p>3 MR. BROWN: Object to form.</p> <p>4 THE WITNESS: Yes. Older roofs, 15, 20 5 years old would be. An 11-year-old roof in my mind 6 is not classified as old, but I would say I would 7 classify a roof 15, 20, 18 to 20 years old as an 8 older roof.</p> <p>9 Q (By Mr. Lawson) Okay. Is there anything 10 that you would change about how you handled the 11 Bales' claim?</p> <p>12 MR. BROWN: Object to the form.</p> <p>13 THE WITNESS: I would have liked to 14 have gotten the gutter linear footage correct on the 15 original estimate and perhaps been involved with the 16 additional emails from Meleah after the claim was 17 moved back to in-office, but other than that, I 18 believe I handled this fairly and appropriately.</p> <p>19 Q Do you stand by your position that none of 20 the damage to the singles is hail damage?</p> <p>21 A Yes, sir.</p> <p>22 Q And you reached that determination based on 23 your training and experience with State Farm?</p> <p>24 A Yes, sir.</p> <p>25 Q Do you believe you handled this claim in</p>	<p>Page 207</p> <p>1 If you'll look, start on page 427 with me, 2 and then kind of going through the next couple of 3 pages 428, 429, 430, 431, 432. And you'll see that 4 there's markings on the roof in blue chalk.</p> <p>5 A Yes.</p> <p>6 Q Circular in nature on all of those pages; 7 correct?</p> <p>8 A Yes.</p> <p>9 Q And then these inspection images also have 10 a description to the left of them, don't they?</p> <p>11 A Yes.</p> <p>12 Q What does that say?</p> <p>13 A PA contractor considerations.</p> <p>14 Q Does that lead you to believe that this is 15 being marked as what the contractor is considering 16 as hail damage?</p> <p>17 A Yes.</p> <p>18 Q And not Korbin?</p> <p>19 A Yeah. And sometimes actually those guys 20 may hand the chalk to the roofer and say mark what 21 you think, what you're seeing as hail and I'll 22 document that for the adjuster.</p> <p>23 Q But nonetheless, the report that Korbin 24 sent indicates there was no hail damage to the roof.</p> <p>25 Is that true?</p>